

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI – DIVISION 5**

SUZETTE K. ANDREASON )  
2469 Luminous Stars Street )  
Henderson, Nevada 89044 )  
Plaintiff, )  
vs. ) Case No.  
 ) Division:  
CAMERON REGIONAL MEDICAL CENTER )  
d/b/a PATTONSBURG MEDICAL CLINIC; and )  
CAMERON REGIONAL MEDICAL CENTER, INC.)  
Defendants, )  
 )  
Serve Registered Agent for Defendants: )  
Joseph F. Abrutz, Jr. )  
Cameron Regional Medical Center, Inc. )  
1600 East Evergreen Street )  
Cameron, MO 64429 )  
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**COMPLAINT**

COMES NOW the Plaintiff Suzette K. Andreason, by and through her attorney, Thomas R. Hill, and for her cause of action, alleges and states as follows:

1. That Plaintiff Suzette K. Andreason is a resident of the State of Nevada.
2. That Plaintiff Suzette K. Andreason was lawfully married to Dan L. Andreason, deceased, until he died at North Kansas City Hospital on April 7, 2010.
3. That Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic is owned by or a subsidiary of Defendant Cameron Regional Medical Center, Inc.
4. That jurisdiction and venue in the United States District Court Western District of Missouri is proper based on diversity jurisdiction.
5. That decedent, Dan L. Andreason presented to Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic on or about March 29<sup>th</sup> of 2010.

6. That the medical needs of Dan L. Andreason, deceased, were tended to by Renee C. Rouse, PA-C an employee or agent of Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic on March 29<sup>th</sup> of 2010.
7. That upon information and belief Renee C. Rouse, PA-C, the employee or agent of Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic, treated Dan L. Andreason, deceased, and then instructed Dan L. Andreason, deceased, to return to his residence in Pattonsburg, Missouri.
8. That upon information and belief, on March 29, 2010, while at Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic under the care of Renee C. Rouse, PA-C, Dan L. Andreason, deceased, had or was having a heart attack and/or other coronary symptoms consistent with an acute myocardial infarction.
9. That Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic and Defendant Cameron Regional Medical Center, Inc. were negligent and careless in that:

Dan L. Andreason had or was having an acute myocardial infarction and Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic and Cameron Regional Medical Center, Inc. negligently and carelessly failed to recognize and appropriately treat the acute myocardial infarction which ultimately lead to the death of Dan L. Andreason.

10. That Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic and Defendant Cameron Regional Medical Center, Inc. were careless and negligent when they, through their agents and employees, instructed Dan L. Andreason to return to his residence in Pattonsburg, Missouri when the decedent, Dan L. Andreason, should have been provided appropriate and immediate emergency medical care to his acute myocardial infarction.
11. That upon information and belief, Dan L. Andreason, the decedent, was emergently transferred to North Kansas City Hospital.
12. That decedent, Dan L. Andreason, was hospitalized at North Kansas City Hospital from March 29, 2010 until he died on April 7, 2010 from an acute myocardial infarction.

13. That while hospitalized at North Kansas City Hospital the decedent, Dan. L. Andreason, received and underwent multiple surgical procedures and additional medical care and treatment.
14. That notwithstanding his care at North Kansas City Hospital the decedent, Dan L. Andreason, died on April 7, 2010.
15. That Defendant Cameron Regional Medical Center, Inc. is vicariously liable for the negligent acts and omissions of its clinic, Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic.
16. That Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic and Defendant Cameron Regional Medical Center, Inc. were otherwise negligent which proximately caused the death of Dan L. Andreason.
17. That Plaintiff Suzette K. Andreason has sustained injuries and damages including medical expenses, lost wages, loss of consortium, loss of services, mental anguish and other damages as a direct and proximate result of the careless and negligent acts and omissions of Defendant Cameron Regional Medical Center d/b/a Pattonsburg Medical Clinic and Defendant Cameron Regional Medical Center, Inc.

WHEREFORE, Plaintiff Suzette K. Andreason requests the Court to enter a Judgment in her favor for a sum in excess of Seventy-Five Thousand and no/100 Dollars (\$75,000.00), costs, interest pursuant to law and for such other and further relief as the Court deems just and equitable.

Respectfully Submitted,

THOMAS R. HILL, LLC

Dated: March 11, 2013

s/ Thomas R. Hill

Thomas R. Hill, MO #36438

Thomas R. Hill, LLC

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**ATTORNEY FOR PLAINTIFF**

**JURY TRIAL DEMAND**

COMES NOW the Plaintiff Suzette K. Andreason and demands a jury trial on all issues so triable.

## **CERTIFICATE OF SERVICE**

I, hereby, certify on the 11<sup>th</sup> day of March, 2013, the above and forgoing document was filed via the CM/ECF system and the above and forgoing document was mailed via United States Postal Service Certified Mail Return Receipt Requested to the following:

Joseph F. Abrutz, Jr.  
Cameron Regional Medical Center, Inc.  
1600 East Evergreen  
P.O. Box 557  
Cameron, MO 64429

**REGISTERED AGENT FOR CAMERON REGIONAL MEDICAL CENTER d/b/a  
PATTONSBURG MEDICAL CLINIC and  
CAMERON REGIONAL MEDICAL CENTER, INC.**

By:

s/Thomas R. Hill  
Thomas R. Hill, MO #36438

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